

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

-----x Case No.:
3:24-cv-09172-MAS-RLS

KEVIN BEASLEY and KEVIN BEASLEY
STUDIO, LLC,

Plaintiffs,

NOTICE OF MOTION

-against-

MICHAEL FANELLI,

Defendant.

-----x

PLEASE TAKE NOTICE, that upon the annexed Affidavit of Michael Fanelli, Memorandum of Law, and upon all pleadings and proceedings heretofore and herein, Defendant will move this Court at the United States District Court, District of New Jersey, at the Courthouse located at 402 East State Street, Trenton, NJ 08608, Courtroom 7W, on the 10th day of February, 2025, at 9:30 a.m. or as soon thereafter as counsel can be heard, for an Order pursuant to FRCP (60)(b)(1) vacating Plaintiffs' default judgment; an Order pursuant to FRCP 62 staying enforcement of the default judgment; and an Order pursuant to FRCP 12 to file an Answer to Plaintiffs' claim.

PLEASE TAKE FURTHER NOTICE, that answering papers, if any, are to be served upon the attorneys for Defendant within ten days after service of the motion pursuant to FRCP 27(a)(3)(A)

Dated: New York, New York
January 16, 2025

WILKOFISKY, FRIEDMAN,
KAREL & CUMMINS

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